

# EASTMAN & SMITH LTD.

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*Established 1844*

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July 5, 2011

**VIA E-MAIL AND U.S. MAIL**

Padmavati G. Bending  
Associate Regional Counsel  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: **Notice of Intent to File Civil Administrative Complaint Against  
International Automotive Components Group North America, LLC**  
Our File No: I245/193054

Dear Ms. Bending:

International Automotive Components Group North America, LLC ("IAC") is in receipt of U.S. EPA's June 22, 2011 letter in the above-captioned matter. For the reasons set out in the materials presented at our January 19, 2011 meeting, which were subsequently expanded upon in IAC's April 7, 2011 response to the agency's Clean Air Act Section 114(a) information request, as well as materials previously exchanged with the State of Michigan, IAC denies the agency's allegations of having operated its Port Huron, Michigan facility without a required permit. Indeed, the monthly emission calculations and production records provided to U.S. EPA and the Michigan Department of Environmental Quality ("MDEQ") demonstrate that the facility operates within the exemption provided by Rule 336.1290 of the Michigan State Implementation Plan ("SIP").

Because of the conclusory nature of the agency's June 22, 2011 pre-filing letter, we are unable to otherwise respond or provide additional information at this time and IAC reserves its rights to do so in the future.

IAC hereby requests a meeting with U.S. EPA to discuss this matter. We further request that U.S. EPA not file its contemplated Civil Administrative Complaint until after that meeting takes place. To facilitate scheduling such a meeting, we advise the agency that IAC's representatives are available to meet with the agency in Chicago on July 29, August 16, 17 or 18, 2011.

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Please contact me at your earliest convenience so that we can schedule the requested meeting or to otherwise discuss this matter.

Very truly yours,

EASTMAN & SMITH LTD.



Joseph A. Gregg

JAG/ksw

cc: Pat Kresnak, (IAC)  
Dave Yanochko, (FTCH)